



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

September 22, 2023

The Honorable Alan Albright
U.S. District Court, Western District of Texas
501 West Fifth Street, Suite 1100
Austin, Texas 78701

RE: *Book People, Inc., et al. v. Martha Wong, in her official capacity as chair of the Texas State Library and Archives Commission, et al.*; In the United States District Court for the Western District of Texas; No. 1:23-cv-00858-ADA

Dear Judge Albright:

Defendants submit this letter brief in response to *Plaintiffs' Letter Motion Requesting Clarified Order* dated September 21, 2023. On September 18, 2023, this Court enjoined §§ 35.001, 35.002, 350.0021, and 35.003 of House Bill 900 ("READER"). ECF No. 43. Plaintiffs now ask this Court to expand its order to further enjoin two additional provisions of READER, contending that allowing §§ 33.021(a) and 33.021(d)(2)(A)(ii) "to be enforced would undermine the Court's holding and allow Defendants to circumvent the Court's well-reasoned findings." ECF No. 49 at 2.

For all of the reasons fully briefed and argued before this Court, Defendants maintain that any injunction of READER is inappropriate and thus should not be expanded to include any additional provisions, but will not burden the court with repetitive briefing that it has already rejected.

Respectfully submitted,

/s/ Christina Cella
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